



JEFFREY P. NOLAN, being duly sworn, deposes and says:

1. I am an attorney at law duly licensed to practice before all courts in the State of California. I am an attorney with the law firm of Pachulski Stang Ziehl & Jones LLP, attorneys of record for Plaintiff, Howard M. Ehrenberg in his capacity as Liquidating Trustee of Orion Healthcorp, Inc., et al., for the estates of the above-captioned debtors, counsel of record in this adversary proceeding. The facts stated herein are of my own personal knowledge, or made known to me from a review of the files and pleadings in this action which are maintained in the ordinary course of business. If called upon as a witness to any facts set forth herein, I could and would competently testify thereto.

2. Plaintiff filed the complaint (the "Complaint") in this action on March 14, 2020 [Docket No. 1]. A copy of the Complaint is attached hereto as **Exhibit 1**.

3. Attached hereto as **Exhibit 2** are true and correct copies of excerpts of the deposition of John Petrozza taken on March 2, 2021 in the above referenced adversary.

4. Attached hereto as **Exhibit 3** is a true and correct copy of the June 28, 2018 correspondence with attached the unredacted Robinson Brog IOLA Quick Report as produced in the main bankruptcy cases In re: OrionHealthcorp, et al.


5. Attached hereto as **Exhibit 4** is a true and correct copy of the Expert Report of Craig Jacobsen as produced and designated in this adversary action.

6. Attached hereto as **Exhibit 5** is a true and correct copy of M&T Bank Statement, bate-stamped Abruzzi M&T 00007-8 in response to a duly issued subpoena.

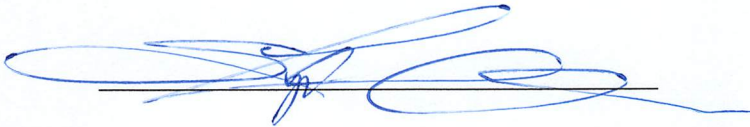
7. Attached hereto as **Exhibit 6** is the Proposed Order Granting Plaintiff's Motion For Summary Judgment, Or In The Alternative Summary Adjudication, Against Defendants John Petrozza and Abruzzi Investments, LLC.

I declare under penalty of perjury under the laws of the United States of America  
that the foregoing is true and correct.

Executed this 18<sup>th</sup> day of February, 2022 at Los Angeles, California.

  
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Jeffrey P. Nolan

SWORN TO AND SUBSCRIBED before me this  
18<sup>th</sup> day of February, 2022

  
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